

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Cr. No. 20-113 (DSD/BRT)**

UNITED STATES OF AMERICA,

Plaintiff,

V.

JOSE A. FELAN, JR.,

Defendant.

**MOTION FOR EARLY
DISCLOSURE OF JENCKS
ACT MATERIAL**

Defendant, Jose Felan, by and through his undersigned counsel, Sicoli Law, Ltd., and Robert D. Sicoli, hereby moves the Court for an Order pursuant to 18 U.S.C. §3500, directing the government to disclose no later than 14 days prior to the commencement of the trial all statements or reports in the possession, custody or control of the government which were made by a government witness or prospective government witness to an agent of the government.

This Motion is based upon all the files, records and proceedings herein.

Dated: June 1, 2021

Respectfully submitted,

SICOLI LAW, LTD.

By: /s/ Robert D. Sicoli
Robert D. Sicoli
Attorneys for Defendant
2136 Ford Parkway #117
Saint Paul, MN 55116
Telephone: (612) 871-0708
Reg. No. 178238